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* Please Reply to : HQ Office Only

April 4, 2017

Via ECF and E-Mail (chambers of vfp@njb.uscourts.gov)

Hon. Vincent F. Papalia
United States District Court - District of New Jersey
50 Walnut Street
Newark, New Jersey 07102

**RE: In re James Kim, Case No. 17-cv-11070
Our File No. CL-101-15**

Your Honor:

Please accept this letter, by which Judgment Creditor Moon Sook Kim (“Creditor”) seeks to join in David Lorenzo’s Objection to the Confirmation of the Plan (per 11 U.S. Code § 1325 - ECF #9) and his Opposition to Motion to Impose a Stay (per 11 U.S. Code § 362 - ECF #16).

Creditor holds a claim against Debtor stemming from a 2013 loan. The debt consists of the loan principal, interest, penalties and contractual attorney’s fees. This debt totals approximately \$250,000, of which at least \$163,000 was reduced to a judgment (Docket no. BER-L-001369-13, Judgment no. J-126644-13) before the filing of the first bankruptcy action (Case no. 16-cv-20275) and is further secured as a lien against Debtor’s two real properties.

In addition to the reasons stated by Lorenzo, Creditor adds the following points: Debtor will not be able to show irreparable harm from fulfilling the judicially-ordered sale of the liquor license to Lorenzo. Rather, the only harm could be monetary, the contractual price of \$290,000 subtracted from the alleged actual value. Debtor claims this amount will be approximately \$40,000, which could be evaluated by a formal assessment.

An auction just would cause further delay by a Debtor who has been contemptuous of court orders, and filed multiple meritless bankruptcy actions.

Therefore, Creditor Moon Sook Kim respectfully requests that the Plan be denied and that the request for a Stay be likewise denied.

Respectfully,

M. ARI JACOBSON

AJ/jh

cc: All counsel (via ECF)